

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CELLULAR COMMUNICATIONS
EQUIPMENT LLC,

Plaintiff,

v.

HMD GLOBAL OY,

Defendant.

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Case No. 2:20-CV-00078-JRG

JURY TRIAL DEMANDED

**DECLARATION OF MAISSA CHOURAKI IN SUPPORT OF OPPOSITION
OF HMD GLOBAL TO CCE’S MOTION TO ENFORCE THE PROTECTIVE ORDER**

I, Maissa Chouraki, hereby declare under 28 U.S.C. § 1746:

1. I am an attorney licensed to practice in the State of California, and an associate at the law firm of Warren Lex LLP, counsel for defendant HMD Global Oy. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, I could and would testify competently to each of them.

2. Attached hereto as Exhibit A is a true and correct copy of this Court’s form patent protective order named “Protective Order—Patent” and available on the Court’s website at http://txed.uscourts.gov/sites/default/files/judgeFiles/Sample_Protective_Order_Patent_Cases_%28April%202019%29.docx.

3. Attached hereto as Exhibit B is a true and correct copy of HMD Global’s “Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action” to Acacia Research Corporation, served on September 25, 2020.

4. Attached hereto as Exhibit C is a true and correct copy of “Acacia Research Corporation’s Objections and Responses to Third-Party Subpoena to Produce Documents in a Civil Action.”

5. Attached hereto as Exhibit D is a true and correct copy of HMD Global’s letter of October 16, 2020.

6. Attached hereto as Exhibit E is a true and correct copy of HMD Global’s letter of October 26, 2020.

7. Attached hereto as Exhibit F is a true and correct copy of CCE’s letter of October 27, 2020.

8. Attached hereto as Exhibit G is a true and correct copy of HMD Global’s letter of October 28, 2020.

9. Attached hereto as Exhibit H is a true and correct copy of HMD Global’s letter of November 3, 2020.

10. Attached hereto as Exhibit I is a true and correct copy of HMD Global’s email of November 5, 2020.

11. Attached hereto as Exhibit J is a true and correct copy of CCE’s email of November 6, 2020.

12. Attached hereto as Exhibit K is a true and correct copy of HMD Global’s letter of November 9, 2020.

13. Attached hereto as Exhibit L is a true and correct copy of CCE’s email of November 12, 2020.

14. Attached hereto as Exhibit M is a true and correct copy of HMD Global's letter of November 12, 2020.

15. Attached hereto as Exhibit N is a true and correct copy of HMD Global's letter of November 16, 2020, attaching its portion of the joint stipulation required by Central District of California Local Rule 37-2.1 to 37-2.2.

16. Attached hereto as Exhibit O is a true and correct copy of CCE's letter of November 20, 2020.


18. Attached hereto as Exhibit P is a true and correct copy of CCE's email of October 1, 2020.

19. Attached hereto as Exhibit Q is a true and correct copy of CCE's email of November 27, 2020.

17. Attached hereto as Exhibit R is a true and correct copy of HMD Global's letter of November 24, 2020.

20. Attached hereto as Exhibit S is a true and correct copy of ARC's 10-K filing of December 2019.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 2, 2020 in San Francisco, California.


Maissa Chouraki